

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Petition of Dig Safe System, Inc. for  
Implementation of 811 as the Abbreviated Dialing  
Code for Providing Notification of Excavation  
Activities to Underground Facility Operators  
Within Massachusetts.

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Docket No. 05-82

**COMMENTS OF  
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.**

**Introduction**

Pursuant to the March 10, 2006, Procedural Notice of the Department of Telecommunications and Energy (“Department” or “DTE”), AT&T Communications Of New England, Inc. (“AT&T”) submits these comments regarding implementation of the 811 dialing system for providing notification of excavation activities to underground facility operators.

In its March 10 Procedural Notice, the Department requested that the parties address their comments to a number of different issues or concerns. AT&T’s comments, set forth below, are organized accordingly.

**Comments**

**1. What needs to be done to implement 811 by: (a) Dig Safe Systems, Inc.; (b) telecommunications carriers; and by (3) users of the one call system.**

- a. DigSafe must provide a toll-free number to which carriers may route 811 calls. According to its comments filed on March 29, 2006, it has already done so.
- b. Telecommunication carriers must undertake and complete the following activities or tasks:

- Carriers must program in the originating central office switch the capability to accept the dialed digits of 811.
- Carriers must program their central office switches to send the call to the appropriate toll-free or local number from their switch when a customer dials 811. Carriers must route calls such that all calls are free to the caller. Carriers must put in the correct translations such that calls that would be toll are converted to an 800/866 number & calls that are local to the OneCall Center are converted to a local number.
- Carrier may determine call routing by either the switch of the originating caller or the NPA-NXX of the originating caller. This issue only applies if a switch serves multiple states, or if a state uses multiple toll-free numbers numbers to reach the One Call Center.
- Carriers must vacate conflicting uses of 811 abbreviated dialing before the federally mandated deployment deadline.
- For carriers seeking cost recovery, those carriers must properly publish the proposed rates and/or charges in accordance with appropriate regulatory requirements.
- Carriers with payphones must implement originating 811 service from those phones as well.
- Unless altered by the Federal Communications Commission (“FCC”), carriers must route calls to the One Call Center via a toll-free number by April 13, 2007.

c. AT&T has no comment regarding users of the 811 system.

**2. What technical, operational or compliance issues, if any, exist with implementation of 811?**

The only remaining issue for resolution by the Department is the issue of cost recovery.

**3. What the implementation schedule would be to meet the FCC’s April 2007 deadline?**

No interim, milestone dates are necessary to meet the April 13, 2007, implementation date.

**4. Identification of, and responsibility for, the costs of implementing and operating the 811 service.**

Carriers seeking cost recovery must identify costs associated with rates and/or charges in accordance with regulatory requirements. Any rates and/or charges resulting from costs of implementing the originating 811 service should be directed to the state One Call Center as the customer.

**5. What must be done to halt any current uses of 811?**

Carriers must deploy a transition plan to move current uses of 811 to another dialing sequence before the FCC-mandated date.

**6. Actions by other states on implementation of 811.**

AT&T has no comment.

**7. Whether evidentiary hearings are necessary, and if so, to provide a proposed procedural schedule?**

Pending receipt of the comments from other parties, AT&T does not see a need for evidentiary hearings.

**8. Any other relevant issue(s).**

AT&T has no comment.

**Conclusion**

AT&T appreciates the opportunity to provide comments to the Department regarding implementation of the 811 dialing system for providing notification of excavation activities to underground facility operators.

Respectfully Submitted,

**AT&T COMMUNICATIONS OF NEW  
ENGLAND, INC.,**

By its attorney,

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